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COMMISSION**

Jeffrey A. Been
Executive Director

March 2, 2006

Stefanie A. Coomes
Information Technology
Manager

Ms Elizabeth O'Donnell, Executive Director
Kentucky Public Service Commission
P.O. Box 615
Frankfort, Kentucky 40602-0615

Carolyn A. Dean
Controller

James K. Elliott
Development Director

Patricia A. Kennedy
Human Resources Director

**RE: In The Matter Of:
CONSIDERATION OF THE REQUIREMENTS OF THE FEDERAL ENERGY
POLICY ACT OF 2005 REGARDING TIME-BASED METERING, DEMAND
RESPONSE AND INTERCONNECTION SERVICE, CASE NO. 2006-00045**

Ronald Marstin
Managing Attorney
Urban Division

Michael "Buck" Morris
Managing Attorney
Volunteer Lawyer Program

Dear Ms. O'Donnell:

S. Stewart Pope
Advocacy Director

Enclosed for filing in the above-captioned case are the original and ten (10) copies of the Motion to Intervene of Metro Human Needs Alliance in the above styled case.

Robert Frederick Smith
Managing Attorney
Rural Division

Please confirm your receipt of this filing by placing the stamp of your office with the date received on the enclosed additional copy and return it to me in the enclosed self-addressed stamped envelope.

Attorneys
Andre Bergeron
Jeffrey S. Brown
Lea D. Hardwick
Gwendolyn Horton
Lisa Kilkelly
Molly Oberhausen
Eileen L. Ordovery
Neva-Marie Polley
Jeffrey B. Segal
Barbara A. Sullivan
Amy Karn Turner
Rita J. Ward
Stephanie C. Willis
John Young

Thank you for your assistance. Please contact me if you have any questions or need further information regarding this matter.

Very truly yours,

Lisa Kilkelly

Paralegals
Robbie D. Brice
Carol Dupin
Catherine M. Ford
Luke Hall
Andrea Y. Robbins
Robert Turpin
Kristie Wells
MaryAnn Werling
Alberta H. White

LK
Enclosures

**Partners For Justice
Fellow:**
Kathryne B. Raines

cc: Service List



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In The Matter Of:

**CONSIDERATION OF THE)
REQUIREMENTS OF THE FEDERAL)
ENERGY POLICY ACT OF 2005)
REGARDING TIME-BASED METERING,)
DEMAND RESPONSE AND)
INTERCONNECTION SERVICE)**

**CASE NO.
2006-00045**

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**PUBLIC SERVICE
COMMISSION**

MOTION FOR FULL INTERVENTION
BY METRO HUMAN NEEDS ALLIANCE

Comes now, **METRO HUMAN NEEDS ALLIANCE** ("MHNA"), by counsel,
and files this Motion for Full Intervention in the above-styled proceeding.

MHNA, a non-profit corporation, is a coalition of social services agencies which assists low income households whose utility service is disconnected or who are threatened with disconnection by the Louisville Gas and Electric Company ("LG&E") because of their inability to pay utility bills. Member agencies provide both financial assistance and advocacy to their clients. MHNA's address is P.O. Box 2377, Louisville, Kentucky 40201.

MHNA has a great interest in this proceeding, since time-based rate schedules and other demand response programs have the potential to affect low-income households, particularly now as such households have been faced with recent increases in gas and electric rates as a whole as well as the cost of gas. Affordable utility service is a critical issue for the low-income community.

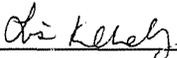
The Commission has previously granted MHNA status as a full intervenor in numerous cases involving various issues regarding gas and electric rates and service to represent the interests of low income utility customers. Some recent cases in which MHNA

has intervened include: *An Adjustment of the Gas and Electric Rates, Terms and Conditions of Louisville Gas and Electric Company, Case No. 2003-00433; An Examination of Louisville Gas and Electric Company's Prepaid Gas and Electric Service, Case No 2002-00232; Demand Side Management 2000-2007 Program Plan of Louisville Gas & Electric Company and Kentucky Utilities Company, Case No. 2000-459; and An Adjustment of Gas Rates of Louisville Gas & Electric Company, 2000-080.* MHNA has also participated before the Commission as a Joint Applicant in cases including *Joint Application of Louisville Gas & Electric Co., Metro Human Needs Alliance, Inc. People Organized and Working for Energy Reform and Kentucky Association for Community Action, Inc. for the Establishment of a Home Energy Assistance Program, Case No 2004-00304.*

MHNA represents an interest that is not otherwise adequately represented, and full intervention by it is likely to present issues and develop facts that will assist the Commission in fully considering this matter without unduly complicating or disrupting the proceedings.

WHEREFORE, Metro Human Needs Alliance requests that it be granted full intervention as a party to this proceeding.

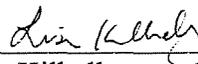
Respectfully submitted,



LISA KILKELLY
LEGAL AID SOCIETY, INC.
425 West Muhammad Ali Blvd.
Louisville, Kentucky 40202
(502) 585-6980
Attorney for METRO HUMAN
NEEDS ALLIANCE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Intervene of Metro Human Needs Alliance was served on the attached service list on the 2nd day of March, 2006, United States mail, postage prepaid.



Lisa Kilkelly
Legal Aid Society, Inc.
425 W. Muhammad Ali Blvd.
Louisville, Kentucky 40202

Attorney for Metro Human Needs
Alliance

Allen Anderson
South Kentucky R.E.C.C.
P. O. Box 910
925-929 N. Main Street
Somerset, KY 42502-0910

Mark A. Bailey
Kenergy Corp.
3111 Fairview Drive
P. O. Box 1389
Owensboro, KY 42302

Michael S. Beer
VP - Rates & Regulatory
Kentucky Utilities Company
c/o Louisville Gas & Electric Co
P. O. Box 32010
Louisville, KY 40232-2010

Kent Blake
Director- State Regulation and Rates
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

Dudley Bottom, Jr.
Shelby Energy Cooperative, Inc.
620 Old Finchville Road
Shelbyville, KY 40065

Daniel W. Brewer
Blue Grass Energy Cooperative Corp
P. O. Box 990
1201 Lexington Road
Nicholasville, KY 40340-0990

Jackie B. Browning
Farmers R.E.C.C.
504 South Broadway
P. O. Box 1298
Glasgow, KY 42141-1298

Sharon K. Carson
Finance & Accounting Manager
Jackson Energy Cooperative
P. O. Box 307
U. S. Highway 421S
McKee, KY 40447

Michael H. Core
Big Rivers Electric Corporation
201 Third Street
P. O. Box 24
Henderson, KY 42420

Paul G. Embs
Clark Energy Cooperative, Inc
P. O. Box 748
2640 Ironworks Road
Winchester, KY 40392-0748

Carol H. Fraley
President and CEO
Grayson R.E.C.C.
109 Bagby Park
Grayson, KY 41143

James B. Gainer
Legal Division
The Union Light, Heat and Power
Company
139 East Fourth Street
Cincinnati, OH 45202

Ted Hampton
Cumberland Valley Electric, Inc
Highway 25E, P. O. Box 440
Gray, KY 40734

George W. Hersey, Jr.
Pennyrite Gas Company, Inc.
110 Locust Street
P.O. Box 1247
Monticello, KY 42633

Larry Hicks
Salt River Electric Cooperative
Corp
111 West Brashear Avenue
P. O. Box 609
Bardstown, KY 40004

Kerry K. Howard
Licking Valley R.E.C.C.
P. O. Box 605
271 Main Street
West Liberty, KY 41472

James L. Jacobus
Inter-County Energy Cooperative
Corporation
1009 Hustonville Road
P. O. Box 87
Danville, KY 40423-0087

Robert M. Marshall
Owen Electric Cooperative, Inc
8205 Highway 127 North
P. O. Box 400
Owenton, KY 40359

Avona L. McArter
Tri-County Communications, Inc
1401 Highland Avenue
Suite 2
Carrollton, KY 41008

Burns E. Mercer
Meade County R.E.C.C.
P. O. Box 489
Brandenburg, KY 40108-0489

Michael L. Miller
President & CEO
Nolin R.E.C.C.
411 Ring Road
Elizabethtown, KY 42701-8701

Timothy C. Mosher
American Electric Power
101A Enterprise Drive
P O Box 5190
Frankfort, KY 40602

Barry L. Myers
Manager
Taylor County R.E.C.C
100 West Main Street
P O. Box 100
Campbellsville, KY 42719

G. Kelly Nuckols
Jackson Purchase Energy Corporation
2900 Irvin Cobb Drive
P. O. Box 4030
Paducah, KY 42002-4030

Anthony P. Overbey
Fleming-Mason Energy Cooperative
P. O. Box 328
Flemingsburg, KY 41041

Roy M. Palk
East Kentucky Power Cooperative,
Inc.
4775 Lexington Road
P O. Box 707
Winchester, KY 40392-0707

Bobby D. Sexton
President/General Manager
Big Sandy R.E.C.C
504 11th Street
Paintsville, KY 41240-1422